

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION - CLEVELAND

IN RE: )  
 ) CASE NO. 11-10218  
 )  
Ellen M. Severson ) CHAPTER 13  
Karl L. Bunkelman )  
 ) JUDGE Arthur I Harris  
Debtors )  
 ) **OBJECTION TO CONFIRMATION**  
 ) **OF THE CHAPTER 13 PLAN**  
 )

Now comes AmeriCredit Financial Services Inc, a creditor herein holding a secured claim in the with in proceedings, by and through counsel, pursuant to 11 U.S.C, Section 1324 and objects to the confirmation of the plan, based upon the proposed valuation of the collateral for the following reasons:

1. The within case was filed on January 11, 2011 and is governed by BAPCPA of 2005.

2. Creditor has a security interest in a 2001 Saturn S Series, VIN#1G8ZP12831Z113086.

3. On March 24, 2007, the Debtors listed above (collectively, the "Debtor") obtained a loan from Movant for the purchase of said 2001 Saturn S Series, VIN#1G8ZP12831Z113086.

4. The monthly payment amount is \$166.16 and Creditor is owed \$4,578.79.

5. The value of the collateral is \$4,200.00, pursuant to N.A.D.A.

6. Creditor should be secured to the extent of the value of the collateral in the amount of \$4,200.00 together thereon with the interest rate of 12%.

7. The Plan fails to specify a provision for pre-confirmation adequate protection payments to the secured creditor.

8. The objection that is raised herewith is a standing objection and shall continue with reference to the currently proposed plan and any subsequently modified plan or plans.

WHEREFORE, Creditor prays that this Court deny confirmation of the Debtor(s) proposed Chapter 13 Plan.

/s/ Cynthia A. Jeffrey

REIMER, ARNOVITZ, CHERNEK &  
JEFFREY CO., L.P.A.

BY: Cynthia A. Jeffrey #0062718

BY: Faye D. English #0075557

P.O. Box 968

Twinsburg, Ohio 44087

Phone: 330-425-4201

Fax: 330-425-2155

Attorneys for Movant

### Notice of Hearing

Parties in interest shall take notice that the within Objection of AmeriCredit Financial Services Inc to Confirmation of Chapter 13 Plan shall come on for hearing **on the date to be set forth by the court** in conjunction with the within matter.

/s/ Cynthia A. Jeffrey

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CERTIFICATE OF SERVICE

A copy of the foregoing Objection was served on the following registered CM/ECF participants, electronically through the Court's transmission facilities at their email addresses listed on the COURTS ELECTRONIC MAIL NOTICE LIST.

1. Office of the U.S. Trustee  
Served via: (registered address)@usdoj.gov
2. Craig H. Shopneck, Trustee  
Served via: ch13shopneck@ch13cleve.com
3. William Balena, Esq.  
Served via: bbalena@mac.com

I hereby certify that the following were served by mailing on February 10, 2011 the same by ordinary U.S. mail, postage prepaid, to the persons listed below:

1. Ellen M. Severson  
Karl L. Bunkelman, Debtors  
23725 Wolf Rd.  
Bay Village, OH 44140

/s/ Cynthia A. Jeffrey

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